

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH  
EMAIL ACCOUNT  
WILLIAMS.JESSY45@YAHOO.COM

No. 2:17-mj-00115-JHR

**Filed Under Seal**

**MOTION TO DELAY NOTICE**

The United States of America, by and through its attorneys, Richard W. Murphy, Acting United States Attorney for the District of Maine, and Daniel J. Perry, Assistant United States Attorney, respectfully moves this Honorable Court to extend the delayed notice period for the search warrant until July 18, 2017. Federal Rule of Criminal Procedure 41(f)(3) generally permits the delayed notice of warrants: “[u]pon the government’s request, a magistrate judge . . . may delay any notice required by this rule if the delay is authorized by statute.” Id. Pursuant to 18 U.S.C. § 3103a, both delayed notice, as well as extensions of delayed notice, are permitted. With respect to the latter, which the Government seeks here:

Any period of delay . . . may be extended by the court for good cause shown, subject to the condition that extensions should only be granted upon an updated showing of the need for further delay and that each additional delay should be limited to periods of 90 days or less, unless the facts of the case justify a longer period of delay.

18 U.S.C. § 3103a(c).

Randy Doucette and other members of this fraud conspiracy are currently the targets of an ongoing investigation conducted by the FBI. Providing notice of the search warrant would seriously jeopardize this investigation and could lead to the flight of co-conspirators, and/or the destruction of evidence. An additional extension of time to serve notice of the search warrant

will permit the Government to continue its investigation without disclosing to Doucette or his associates the existence of this ongoing criminal investigation.

WHEREFORE, the Government requests that notice of the search warrant be delayed until July 18, 2017.

Dated at Portland, Maine this 9th day of June, 2017.

Respectfully submitted,

Richard W. Murphy  
Acting United States Attorney

/s/Daniel J. Perry  
Assistant U.S. Attorney